

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

YARED BEYENE, et al.)
Plaintiffs)
)
v.) CASE NO: 3:06-0628
)
COVERALL OF NORTH AMERICA,) JUDGE HAYNES
INC., PACIFIC COMMERCIAL) JURY DEMANDED
SERVICES, LLC, COVERALL)
CLEANING CONCEPTS, and)
COVERALL OF NASHVILLE, INC.)
Defendants)

MOTION FOR REMAND

Plaintiffs move this Court for an Order remanding this case to the Chancery Court for Davidson County, Tennessee, where this matter was initially filed. The basis for Plaintiffs' Motion to Remand is set forth with more particularity in their accompanying "Memorandum in Support of Their Motion to Remand." By separate Motions, Plaintiffs also

(1) have served Defendant Coverall of North America, Inc. with a Motion for Sanctions, pursuant to Rule 11 of the Federal Rules of Civil Procedure, and intend to seek every remedy available to them and against Defendant Coverall of North America, Inc. and its counsel for filing a paper with this Court containing knowing misrepresentations, unless the paper is withdrawn or appropriately corrected, and

(2) are filing, contemporaneously herewith, a request for oral argument pertaining to their Motion for Remand.

Respectfully submitted:

BLACKBURN & MCCUNE, PLLC

/s/ PATRICK DOLLAR

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SunTrust Bank Building
Suite 1700
201 Fourth Avenue, North
Nashville, Tennessee 37219

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion to Remand and supporting Memorandum was hand delivered to the following:

John Tarpley, Esq.
Lewis, King, Krieg & Waldrop, PC
SunTrust Bank Building
Suite 1500
201 Fourth Avenue, North
Nashville, Tennessee 37219

on this, the 7th day of July, 2006.

/s/ PATRICK DOLLAR

Patrick Dollar